

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

MARINA ABRAMOVICH,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiff, Case No. 18 Civ. 5342 (DLI) (RML)

v.

MAGIC HOME CARE LLC,

Defendant.

**PLAINTIFF'S NOTICE OF MOTION
FOR SANCTIONS DUE TO
DEFENDANT'S FORGERY**

PLEASE TAKE NOTICE THAT upon the accompanying Declaration of Plaintiff's counsel J. Burkett McInturff, dated March 15, 2021, with annexed Exhibits and Plaintiff's Memorandum of Law in Support, Plaintiff Marina Abramovich hereby moves this Court under Rule 7.1 of the Local Civil Rules for the United States District Courts for the Southern and Eastern Districts of New York and under the Court's inherent power for an Order:

- (1) Dismissing Defendant's Answer to Plaintiff's Complaint; and
- (2) granting default judgment on the claims in Plaintiff's complaint.

In support of her Motion, Plaintiff relies on the accompanying Memorandum of Law and the McInturff Declaration, and all exhibits annexed thereto.

Dated: March 15, 2021
Armonk, New York

Respectfully submitted,

WITTELS MCINTURFF PALIKOVIC

By: /s/ Steven L. Wittels
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